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IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

IN RE:
 HAWAII FEDERAL ASBESTOS CASES

) CASE NOS. CV03-00325 REJ LEK
) CV03-00326 REJ KSC
)
) **PLAINTIFFS' MOTION TO (1)**
) **APPROVE ENTERING INTO**
) **STIPULATION WITH TRUSTEE IN**
) **THE ARTER & HADDEN LLP**
) **CHAPTER 7 BANKRUPTCY, AND (2)**
) **ISSUE AN ORDER TO SHOW CAUSE**
) **TO THE "MINIDOM INSURERS";**
) **MEMORANDUM IN SUPPORT OF**
) **MOTION; DECLARATION OF**
) **COUNSEL; EXHIBITS A-F;**
) **CERTIFICATE OF SERVICE**

LORENZO BACLAAN and NAOMI
 BACLAAN, et al.,

Plaintiffs,

vs.

COMBUSTION ENGINEERING, INC., a
 Delaware corporation, et al.,

Defendants.

IN RE:
 HAWAII FEDERAL ASBESTOS CASES

GEORGE H. TORO and VIVIAN TORO, et al.,

Plaintiffs,

vs.

COMBUSTION ENGINEERING, INC., a
 Delaware corporation, et al.,

Defendants.

**PLAINTIFFS' MOTION TO (1) APPROVE ENTERING
INTO STIPULATION WITH TRUSTEE IN THE ARTER & HADDEN
LLP CHAPTER 7 BANKRUPTCY, AND (2) ISSUE AN
ORDER TO SHOW CAUSE TO THE "MINIDOM INSURERS"**

Plaintiffs hereby move this Honorable Court pursuant to FRCP 23 for permission to enter into the "Stipulation Regarding Trustee's First Omnibus Objection to Claims", a true and correct copy of which is attached hereto and marked as Exhibit A. The purpose of this Stipulation would be an agreement to lift the automatic bankruptcy stay in favor of debtor Arter & Hadden LLP and to permit Plaintiffs to pursue their remedies in state or federal court only to the extent of insurance coverage but not against any other assets of Arter & Hadden.

Plaintiffs also respectfully request this Honorable Court to issue an Order to Show Cause to the insurers of Defendants Robert B. Preston, Esq. and Arter & Hadden LLP, to state whether said insurers are denying coverage or conceding coverage of the claims made herein, and if denying coverage, on what grounds.

This Motion is based upon the Memorandum of Law attached hereto, Declaration of Counsel, exhibits attached thereto and all the pleadings and papers filed herein.

/s/ L. Richard DeRobertis

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